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September 20, 2024

VIA ECF

Hon. John G. Koeltl, U.S.D.J.
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Dayner Hackshaw v. Justworks, Inc.*
Civil Action No. 1:24-cv-02013 (JGK)

Dear Judge Koeltl:

This firm represents Defendant Justworks, Inc. ("Justworks"). We submit this letter in accordance with Your Honor's Individual Rules to respectfully request a 30-day extension of Justworks' deadline to respond to Plaintiff's motion for conditional certification under the Fair Labor Standards Act, from the current deadline of October 2, 2024, to November 1, 2024. This is Justworks' first request for an extension, and we respectfully submit that it is the minimum necessary for Justworks to prepare an adequate response to Plaintiff's motion, particularly in light of the Court-ordered mediation scheduled for October 1, 2024.

Unfortunately, Plaintiff has refused to consent, agreeing only to a 10-day extension, for no substantive reason (a copy of Plaintiff's e-mail communicating his refusal is attached).

Your Honor's courtesies and consideration of our request are appreciated.

Respectfully submitted,

/s/ Amy E. Canning

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*Time to respond to the
motion for conditional certification
extended to 10/25/24. Time to
reply extended to 11/8/24.*

SO ordered.

*9/23/24 JGK/Koeltl
U.S.D.J.*